

VINEET BHATIA (*admitted pro hac vice*)
vbhatia@susmangodfrey.com
SHAWN RAYMOND (*admitted pro hac vice*)
sraymond@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1000 Louisiana Street
Suite 5100
Houston, TX 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666

JESSE-JUSTIN CUEVAS (SBN 307611)
jcuevas@susmangodfrey.com
MADELINE YZURDIAGA (SBN 344676)
myzurdiaga@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars
Suite 1400
Los Angeles, CA 90067
Telephone: (310) 789-3100
Facsimile: (310) 789-3150

Attorneys for Defendant CDK Global, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

TEKION CORP., a Delaware corporation

Plaintiff,

vs.

CDK GLOBAL, LLC, a Delaware limited
liability company

Defendant.

Case No. 3:24-cv-08879-JSC

**DECLARATION OF VINEET BHATIA
IN SUPPORT OF DEFENDANT CDK
GLOBAL, LLC'S MOTION TO
DISMISS**

Date April 24, 2025
TIME: 10:00 a.m.
PLACE: San Francisco Courthouse,
Courtroom 8 – 19th Floor
450 Golden Gate Avenue, San
Francisco, CA 94102

1 I, Vineet Bhatia, declare as follows:

2 1. I am a partner with the law firm of Susman Godfrey L.L.P., which represents CDK
3 Global, LLC (“CDK”) in this matter. I am admitted to practice *pro hac vice* in this matter. I make
4 this declaration in support of CDK’s Motion to Dismiss. I have personal, first-hand knowledge of
5 the matters below and, if called to testify as a witness, I could and would testify competently to
6 them.

7 2. Attached as **Exhibit 1** is a true and correct copy of the print article “Tekion’s sights
8 set on growth milestones,” authored by Mark Hollmer and published in *Automotive News* on
9 April 15, 2024.

10 3. Attached as **Exhibit 2** is a true and correct excerpt of Plaintiff Tekion Corp.’s U.S.
11 Master Subscription Agreement (“MSA”), effective September 26, 2024, which is available online
12 from Tekion’s website, <https://tekion.com/legal/agreements/us-arc-msa>.

13 4. Attached as **Exhibit 3** is a true and correct copy of the transcript of Asbury
14 Automotive Group, Inc.’s January 30, 2025, Q4 2024 Earnings Call, which is available online at
15 [https://seekingalpha.com/article/4753599-asbury-automotive-group-inc-abg-q4-2024-earnings-](https://seekingalpha.com/article/4753599-asbury-automotive-group-inc-abg-q4-2024-earnings-call-transcript)
16 [call-transcript](https://seekingalpha.com/article/4753599-asbury-automotive-group-inc-abg-q4-2024-earnings-call-transcript).

17 I declare under penalty of perjury of the laws of the United States that the foregoing is true
18 and correct.

19 Executed this 10th day of February, 2025 at Houston, Texas.

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21 /s/ Vineet Bhatia

22 Vineet Bhatia
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